

|                              |   |                                   |
|------------------------------|---|-----------------------------------|
| <b>PRIME TANNING COMPANY</b> | ) | <b>DEPARTMENTAL</b>               |
| <b>YORK COUNTY</b>           | ) | <b>FINDINGS OF FACT AND ORDER</b> |
| <b>BERWICK, MAINE</b>        | ) | <b>AIR EMISSION LICENSE</b>       |
| <b>A-376-70-D-M</b>          | ) | <b>AMENDMENT #3</b>               |

After review of the Part 70 License minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

**I. REGISTRATION**

A. Introduction

|                                  |                                |
|----------------------------------|--------------------------------|
| FACILITY                         | Prime Tanning Company (Prime)  |
| LICENSE NUMBER                   | A-376-70-D-M                   |
| LICENSE TYPE                     | Part 70 License Minor Revision |
| SIC CODES                        | 3111-Leather Tanneries         |
| NATURE OF BUSINESS               | Leather Tanning and Finishing  |
| FACILITY LOCATION                | Sullivan Street, Berwick       |
| DATE OF INITIAL LICENSE ISSUANCE | April 26, 2000                 |
| DATE OF MINOR REVISION ISSUANCE  | July 1, 2003                   |
| LICENSE EXPIRATION DATE          | April 26, 2005                 |

B. Application Classification

The application is for the installation of two hand spray booths with dry filter pad overspray capture and one spray line with dry filter pad overspray. The modification will not result in a change of Prime's existing air license emission limits. The application does not involve a relaxation or change in monitoring, testing, reporting or recordkeeping requirements. Actual VOC and HAP emissions are anticipated to be rather low since the equipment is planned for R&D purposes. The spray booths do represent new equipment at a major source, therefore Prime's existing BACT requirements, as specified in their current air emissions license, apply to the new equipment as well.

This application is being processed as a minor modification of a Part 70 source, under the requirements of Section 5 (B) of Chapter 140 of the Department's regulations for a Part 70 source.

## II. AMENDMENT DESCRIPTION

### New Equipment Description

Prime has requested to move (2) hand spray booths from their Rochester plant to the Berwick plant and retain one of the (2) spray booths and dryers from the Dual Down line currently in Berwick. This equipment would be used by the Research & Development and Sample departments and will not be used for regular leather production.

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. The equipment proposed in this amendment is subject to Best Available Control Technology. For Prime Tanning's existing leather tanning operations, the previous BACT analysis established a pound of VOC per 1000 square foot limit along with a ton per year limit. The new equipment requested per this amendment shall meet those prior BACT determinations. The (2) hand spray booths and (1) spray line addressed in this amendment will operate only for research and development purposes. Therefore, emissions from these units are expected to be minimal as compared to the full processing done on other Prime Tanning lines. Each spray booth shall operate with dry filter overspray capture, estimated with an 85% particulate collection efficiency. There is no increase in the licensed allowed VOC emissions currently set in their air emission license.

### ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will meet existing Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

|                              |          |                                   |
|------------------------------|----------|-----------------------------------|
| <b>PRIME TANNING COMPANY</b> | )        | <b>DEPARTMENTAL</b>               |
| <b>YORK COUNTY</b>           | )        | <b>FINDINGS OF FACT AND ORDER</b> |
| <b>BERWICK, MAINE</b>        | )        | <b>AIR EMISSION LICENSE</b>       |
| <b>A-376-70-D-M</b>          | <b>3</b> | <b>AMENDMENT #3</b>               |

The Department hereby grants the Part 70 License minor revision A-376-70-D-M, subject to the following conditions:

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: *Enforceable by State-only*.

**SPECIAL CONDITIONS**

**The following conditions are in addition to the existing conditions of Air Emission License A-376-70-A-I and subsequent revisions/amendments.**

- (1) Prime can operate (2) hand spray booths and (1) spray line, as addressed in the Finding of Fact of this revision, for research and development purposes. The R&D spray booths and spray line shall operate and maintain dry filter pad overspray capture. The VOC emissions from these units shall be included in the BPT requirements for recordkeeping and control of Volatile Organic Compounds (VOC) as specified in Condition (29) of Air Emission License A-376-70-A-I and Air Emission License Amendment A-376-70-C-A. [MEDEP Chapter 140]
  
- (2) This amendment shall expire concurrently with air emission license A-376-70-A-I.

DONE AND DATED IN AUGUSTA, MAINE THIS                      DAY OF                      2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: \_\_\_\_\_  
DAWN R. GALLAHGER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: December 9, 2002  
Date of application acceptance: December 9, 2002  
Date filed with the Board of Environmental Protection \_\_\_\_\_

|                              |          |                                   |
|------------------------------|----------|-----------------------------------|
| <b>PRIME TANNING COMPANY</b> | )        | <b>DEPARTMENTAL</b>               |
| <b>YORK COUNTY</b>           | )        | <b>FINDINGS OF FACT AND ORDER</b> |
| <b>BERWICK, MAINE</b>        | )        | <b>AIR EMISSION LICENSE</b>       |
| <b>A-376-70-D-M</b>          | <b>4</b> | <b>AMENDMENT #3</b>               |

This Order prepared by Edwin Cousins, Bureau of Air Quality.